ORIGINAL FILE

LAW OFFICES
BLOOSTON, MORDKOFSKY, JACKSON & DICKENS
2120 L STREET, N.W.
WASHINGTON, D.C. 20037

(202) 659-0830
TELECOPIER: (202) 828-5568

ARTHUR BLOOSTON
HAROLD MORDKOFSKY
ROBERT M. JACKSON
BENJAMIN H. DICKENS, JR.*
JOHN A. PRENDERGAST
GERARD J. DUFFY
RICHARD D. RUBINO*
BRIAN D. ROBINSON
SUSAN J. BAHR*
JULIAN P. GEHMAN*

*NOT ADMITTED IN D.C.

JEREMIAH COURTNEY
OF COUNSEL

EUGENE MALISZEWSKYJ
DIRECTOR OF ENGINEERING
PRIVATE RADIO

DARRYL K. DELAWDER
DIRECTOR OF ENGINEERING
COMMON CARRIER & BROADCAST

December 28, 1992

RECEIVED

DEC 28 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

WRITER'S DIRECT DIAL NO.
(202) 828-5528

Donna Searcy, Secretary
Federal Communications Commission
1919 M Street, NW
Room 222
Washington, DC 20554

Re: CC Docket No. 92-237

Dear Ms. Searcy:

Transmitted herewith, on behalf of Whidbey Telephone Company, are a facsimile original and nine (9) copies of its comments in response to the Commission's Notice of Inquiry, FCC 92-470, released October 29, 1992, in CC Docket No. 92-237. We will submit an original signed copy as soon as possible.

If you have any questions concerning this matter, please contact this office.

Very truly yours,

Gerard J. Duffy

Gerard J. Duffy

GJD:ktd
enclosure

No. of Copies rec'd 0+9
List A B C D E

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

Administration of the
North American Numbering Plan

CC Docket No. 92-237

Whidbey Telephone Company hereby submits its comments in response to the Notice of Inquiry, FCC 92-470, released October 29, 1992 in the above captioned proceeding.

These comments focus on the need for a mandated solution to the critical problem of the exhaustion of NXX[1] Central Office codes and also of NPA[2] codes in the North American Numbering Plan ("NANP"). In this case, "mandated" means required by authority outside of the telecommunications industry, and this is necessary because efforts set forth from within the industry, particularly by Bellcore[3], have allowed what used to be an easy-to-understand and efficient numbering system to deteriorate into a complex, fragmented and inefficient system which is not in the public interest.[4] Furthermore, Bellcore's present plan, the Interchangeable Code Plan, which now is only partially implemented, is about to force new damaging changes in the basic structure of telephone numbers throughout the United States by destroying the sanctity of either the digit 1 or 0 as the second digit of all area codes. Such new changes must be prevented, as they amount to jumping from the frying pan into the fire by causing the already complex long distance dialing requirements to become even more user-hostile. If second digits other than 0 and 1 are to be allowed in area codes, those changes will become irreversible, causing permanent inefficiencies, frustrations and unnecessary costs to the general public. Like lambs to the slaughter, it seems that we are being led into permanent loss of distinctive area codes, and that loss will be a serious mistake.

As explained in detail below, a plan for the use of four-digit area codes ("F-DAC Plan"), which preserves the distinctive 0 or 1 in the second digit of all area NANP area codes, presents a better and longer-range solution to the code shortage problem than does the Interchangeable Code Plan. Unfortunately, because of the entrenched position of Bellcore with respect to its plan, prompt and decisive action will be essential if the grinding power of Bellcore's momentum, and of consequential industry inertia are to be halted. Moreover, because of Bellcore's prestigious history and well-known name, many people seem reluctant to challenge Bellcore assertions that its plan is the best, or that it

---

[1] N = any digit except 0 or 1; X = any digit from 0 through 9.

[2] Numbering Plan Area codes, or simply, area codes.

[3] Bell Communications Research, Inc.

[4] Overlaid area codes have resulted in the necessity of dialing 10 digits for local or Extended Area Service (EAS) calls in some parts of the United States. Intra-NPA long distance calls require the format of 1 or 0 plus a seven-digit number in some parts of the country, while in others the required format is 1 or 0 plus ten digits. In other areas, certain long distance calls may be dialed without a prefixed 1; this is not due to Bellcore plans, but is mentioned here because it is a part of the non-standardization problem that perplexes telephone users who travel and find that their familiar dialing habits don't work even in parts of our own country.

is the most economical to implement. It will be refreshing to have a chance for an independent evaluation of telephone number shortage problems by the FCC.

Noting that the instant NOI[5] itself refers to the possibility of lengthening area codes to four or more digits, while retaining the distinctive 0 or 1 as the second digit, and also to the possibility of lengthening local telephone numbers to eight or more digits, it appears that previous comments to the Commission urging that these issues not be reopened have been given great weight by the Commission, causing it to conclude that these matters should not be reopened. With respect to the combination of both of the proposed avenues of change, this commenter concurs, but with respect to the possibility of using area codes of four digits, this commenter urges serious further study, especially as contemplation of such a plan may have been integral to NARUC's request to the FCC for examination of alternatives.[6] Statements made by commenters, but not supported by persuasive factual proof, that it is too late to change plans, or that it is too complicated or too expensive, or that the implementation time surely will exceed the available time before the scheduled 1995 implementation of NXX-type area codes, beg for substantiation. Moreover, it would seem well for the FCC to examine carefully the matter of from whom the referenced comments came. Were the commenters largely entities who have a vested interest in seeing full implementation of the Interchangeable Code Plan? Have they really thought out what is (and is not) required to go to four-digit area codes, or are they giving a knee-jerk reaction? If the commenters that caused the FCC to conclude that alternatives should be foreclosed consisted of only GTE and the United States Telephone Association, and possibly of UTI, it is probable that most of these commenters had given either no or but superficial consideration to the F-DAC Plan. On February 28, 1991 this commenter sent a letter dealing with F-DAC to Chairman Sikes, and on March 11, 1991 the same material was sent to each of the other commissioners. Moreover, on March 8, 1991 the Washington Utilities and Transportation Commission sent basically the same material to the head of the Common Carrier Bureau. It is requested that the documents sent to the FCC be made a part of the record in this matter The FCC recognizes, of course, that it is the public interest that must be examined and served here, not necessarily the interests of huge telecommunications companies such as the owners of Bellcore.

The F-DAC Plan should not be dismissed out-of-hand. It should be given at least a fair look to see if it might be meshed in with the first half of the Interchangeable Code Plan, the latter being limited to the extent to which it has been, or necessarily will have been, implemented by 1995. But it is of critical importance that the second half of the Interchangeable Code Plan be cancelled in its entirety. Also, it would be desirable to cease further implementation of the first half of that plan as soon as the F-DAC Plan could provide area code relief, but the first half of interchangeability is not as damaging as the second.

Taken alone, the issue of changing from three-digit area codes to four-digit codes may not be daunting, even within a two-year period. With the complexity of international dialing requirements

---

[5] NOI page 6, Item 43.

[6] It is the belief of this commenter that the F-DAC Plan may have been directly instrumental in causing the NARUC to petition the FCC for the instant Notice of Inquiry.

already requiring considerable sophistication and versatility in electronic (including digital) switches, it is our understanding that changing to NANP dialing with four-digit area codes would be but a small matter to at least the major switch manufacturers. Moreover, the instant NOI cites an opinion by commenter UTI that "cross-bar switches will need to be replaced in order to implement interchangeable NPA codes," adding that it believes that there are no reasonable alternatives.[7] Thus, it would appear that any argument that F-DAC would require the replacement of crossbar switches would be meaningless.

Returning to the Commission's apparent reluctance to reopen examination of alternatives, as requested by NARUC, the NOI mentions the fact that "for at least 20 years, the [telecommunications] industry, and switch manufacturers, have worked toward interchangeable codes. Some 30 of the nation's area codes have already converted to using office codes with the new [area code] format. The remaining NPAs are scheduled to have this capability by 1995."[8] It is important to note that 20 years ago most switches lacked the flexibility of today's stored program electronic switches, which make changes like four-digit area codes easily within grasp, as compared with the almost total inflexibility of many kinds of electromechanical switches.

It is very important to point out three things about the Interchangeable Code Plan. First, in its present state of implementation, there is nothing mutually exclusive between that plan and the F-DAC Plan; all present, and even all contemplated, use of area code formats for central office codes may remain intact. Second, it is the second half of the Interchangeable Code Plan that will really cause the greatest damage, and that is the use of area codes lacking a 0 or 1 as the second digit. Third, the NOI says that the use of interchangeable codes "will expand the number of potential NPA codes from 160 to 800."[9] The F-DAC Plan would expand the number of potential NPA codes from 160 to 1600, increasing the life of this solution dramatically over the Interchangeable Code Plan while retaining the all-important ability of switches promptly to distinguish between office codes and NPA codes. The F-DAC Plan should solve both the local office and NPA code shortage problems for many decades, even if there is no use of NXX codes for local central offices. It would eliminate the need for much post-dialing delay, or the other wastes mentioned below.

Use of even one area code in an NXX office code format will force nationwide changes because all switches will lose the immediate ability to determine whether a long distance call is to be a seven-digit call or a ten-digit call. The ramifications of this are explored below, but it should be noted here that this second half of the implementation of the Interchangeable Code Plan still is scheduled more than two years from now. The relatively simple implementation of F-DAC probably could be achieved in the available time period as readily as further implementation of the second half of the Interchangeable Code Plan. The alleged long lead times, presumably high costs, and uncertainty mentioned in the NOI may be illusory, and should be examined closely by the Commission before it

---

[7] See NOI page 6, footnote 56.

[8] See NOI page 6, Item 43. Footnote citations omitted.

[9] NOI page 2, last sentence of Item 11.

considers rejecting F-DAC. Again, the F-DAC Plan would provide ten times the quantity of telephone numbers and area codes that are now available, and it would do this without sacrificing the presence of the distinctive 0 or 1 as the second digit of NANP area codes. This would allow preservation of 0 or 1 plus seven-digit dialing of intra-NPA long distance calls in those areas where ten digits are not required, although inter-NPA calls would require 0 or 1 plus eleven digits. High volumes of home-NPA calls compared with lower volumes of inter-NPA would seem to make the trade-off of retention of seven-digit home-NPA calling for one more digit in inter-NPA calling a good one. Whidbey Telephone Company's experience with a recent mandatory conversion from 0 or 1 plus seven digit long distance dialing in the 206 NPA to 0 or 1 plus ten digits is convincing proof to us that customers strongly favor retention of the shorter format for home-NPA long distance calling. It is likely that an informed public would much prefer remembering and using the one additional (D) area code digit and retaining existing intra-NPA dialing patterns, as opposed to being forced to dial 10 digits for all long distance calls, as well as suffering confusion and inefficiency due to expansion of interchangeable codes. The Four-Digit Area Code Plan would avoid the confusion, delays and customer inconveniences that would result from use of interchangeable area codes.

Conflict Resolution and Public Inconvenience

Dealing with the first part of the Interchangeable Code Plan, the main problem arises because, in those NPAs where the plan is implemented (and only in those), if the B digit in the series being dialed at the originating location is a 1 or a 0, it will have lost the distinction of being part of an area code, present only if the call is intended to go to a different NPA. This loss frustrates efforts to determine promptly how a call should be routed, and it delays call completion. Some kind of conflict resolution must be used to establish whether calls with a 0 or 1 in the B digit will be processed as seven-digit calls, or as ten-digit calls, and to allow prompt and proper routing of those calls.

When calls are dialed with a 1 or 0 in the B digit, one unsatisfactory method of conflict resolution is to introduce an arbitrary period of delay during which the equipment receiving dial pulses or tones from originating telephone lines pauses before deciding that the caller must have completed his or her dialing. This deliberately introduced delay is usually established to span about four seconds. Too short a delay means that wrong numbers would be reached in cases where calls were intended to use ten digits, but the equipment had decided prematurely that no further digits were expected after the seventh. Calls of that kind would be routed as intra-NPA calls when they were intended to be inter-NPA. On the other hand, too long a delay would simply frustrate callers by costing them several seconds of unnecessary waiting before their calls were even started in their routing and completing functions, not to mention reaching a ringing signal. Whatever arbitrary delay period may be chosen, poor results can be expected because of some combination of the two wasteful disadvantages.

Another method of conflict resolution is for callers to conclude their dialing with the tones generated by the # button, which is intended to signal, "I am through dialing." There are several disadvantages to that. Some dials or kinds of equipment, obviously including all rotary dials, do not have # available. Even when it is available, some people will not know how to use it. If they do use it, some telephone equipment may not respond to it. But the most significant disadvantage of dialing # is that it transforms seven-digit calls into eight-"digit" calls, so that local, EAS and intra-NPA toll

calls effectively require either eight digits or, alternatively, seven digits with a long delay (assuming use of the prefix 1). This would be unacceptably inefficient.

Two other means of conflict resolution or avoidance have been used extensively in various parts of the country. The first is to eliminate the initial digit 1 for intra-NPA toll calls, so that no seven-digit call could be prefaced with that digit. Assuming that inter-NPA long distance calls would be prefixed by a 1, central offices directly receiving customer dialing would be able to recognize that only seven digits were to be expected for calls not prefixed by 1 (excluding special codes, such as 911) and, conversely, that ten digits were to be expected if the 1 prefix were dialed. This would eliminate the requirement for the four-second conflict resolution delay by removing ambiguity in the first three digits dialed, but the delay problem would not be eliminated if 1 were left off as a preliminary digit for ten-digit calls. The lack of uniformity in dialing 1 for extra-charge (usually long distance) calls could be perplexing to the public, since a substantial percentage of Americans probably have come to rely on the notion that they have not placed toll calls if they dial numbers without a 1 or 0 as a prefix.

The second commonly used method of conflict resolution is to require that all U.S. toll calls be prefixed with a 1 or a 0, which invariably would be followed by ten more digits. This means that callers within their own NPAs would have to dial 1 or 0 plus ten digits to complete long distance calls even within their home NPAs. Some of the savings gained by avoiding four-second timeouts would be lost in dialing three actually unnecessary area code digits.

Delays

Turning to the issue more broadly, it seems that we have been taking some giant steps backwards. Common Channel Interoffice Signaling ("CCIS") and it's latest version, Signaling System 7 ("SS7") have been moving call completion times toward milliseconds rather than several seconds, even for inter-NPA calls. It has been very efficient. But the Interchangeable Code Plan has been causing either post-dialing delays, each wasting about four seconds, millions of times a day, or millions of cases of wasted time caused by dialing unnecessary intra-NPA area codes. Collectively, any combination of these wastes is considerable both in terms of lost man hours and central office equipment holding times, and, with continued implementation of interchangeable codes, these wastes are increasing. This trend seems to be resulting in poor expenditure of public resources. Some of the advantages that we have been buying in highly sophisticated network signaling systems, such as SS7, are being squandered by continued movement into the Interchangeable Code Plan, and, if the presently projected 1995 implementation of NXX codes for NPA codes is allowed to occur, a major new wave of inefficiency may be expected.

A Cure

Why is the use of interchangeable codes spreading? It may have been a good idea years ago, but now it is like a sickness that started when there was no reasonable cure. Rather fatalistically, we seem to be exacerbating wounds that we have already suffered by embedding ourselves further and further in precedent without looking to see if there is a recently developed cure. Today there is a cure, and further, the cure can accomplish more than stopping the disease - it can reverse its past effects. The cure is made possible because most of today's central office switches in this country are electronic,

and in many states most or all are digital. The FCC should revisit the whole subject of code interchangeability, and weigh the possibility of stopping at least the second half of its implementation cold in its tracks, rather taking an entirely new path instead.

Conversion to F-DAC could be done by a national slash-cut, or it could be progressive, starting with only a single area code. It could be extended to cover the entire North American Numbering Plan area later if desired for uniformity. If F-DAC were to be employed in other NANP countries, even more area codes could be available for use in the U.S., assuming that some four-digit derivatives of present foreign area codes were not needed in those countries. In Canada, for example, if the 604 area code were changed to 6040, and reservation of NPA codes 6041 and 6042 apparently would be sufficient for Canadian needs for many decades, then codes 6043, 6044, etc. could be used in the U.S. at some rather distant time.

While no single solution is ideal, F-DAC's eleven-digit inter-NPA dialing has the advantage of allowing the freezing of intra-NPA dialing in its present formats. Although interchangeable codes have been eroding them, I believe that the preponderantly used intra-NPA dialing patterns still are seven digits in NXX-XXXX format for local and EAS calls, and 1 or 0 plus seven digits for toll calls. With F-DAC, loss of 1 before long distance numbers would not be necessary, so that people could retain the reasonable presumption that they were dialing long distance calls if they prefixed 1 to the called number. Furthermore, people would not have to waste their time dialing an unnecessary home NPA code.

Special operator codes should be no problem in the F-DAC Plan because they are originated only from operator positions or testboards. The number of digits being used can be clearly defined by the envelope defined by multi-frequency "KP" tones at the beginning, and the "Start" tones at the end, of the dialing sequence, or by their equivalents in SS7 format.

Conversion to the Four-Digit Area Code Plan

The F-DAC Plan could be started by converting a single NPA or state, by converting one region or more, or by converting the whole country. However, prior to the use of the first four-digit area code, most switches[10] in the NANP would have to be arranged to recognize and route calls using present area codes with an appended 0 In cases where N0X/N1X formats have been used for local office codes in an NPA, F-DAC would not mandate changes of such local office codes. If people in such an NPA wanted to do away with post-dialing delay and other wasteful problems caused by the dialing of unclear digits such as 213-5091, the N0X/N1X office codes in that NPA could be changed back to the restored standard NNX configuration (not NXX). If this were done throughout an affected NPA, all local central offices in it then should be able to make an early determination of precisely what to expect during dialing sequences for U.S. calls, and the damages of much post-dialing delay or dialing of unnecessary NPA codes could be at worst contained, and at best reversed and eventually

[10] Some exceptions could exist. For example, step-by-step offices that immediately route calls with an initial digit of 1 or 0 to another central office could remain unmodified.

eliminated. Nationwide implementation of the F-DAC Plan should be done as soon as possible in order to achieve optimal reduction of various forms of wasteful delay and frustration to the public.

Within a particular NPA already afflicted with N0X/N1X local office codes, perhaps the majority of the affected people would not want the awkwardness of local office code changes. If decisions were made to retain N0X/N1X local office prefixes in one or more of such NPAs, the inconveniences and costs of those decisions would be contained within those respective NPAs. Digit conflict resolution would not be necessary outside of such NPAs because area codes would be necessary for inter-NPA toll calls in any event, so long distance calls from outside the affected NPAs generally could not be seven-digit calls. The fact that there is flexibility in containing or reversing existing conflict resolution problems would allow costs to be kept down to the maximum practicable extent by use of the F-DAC Plan.

If one views the results of implementation of only the first half of the Interchangeable Code Plan as having been service-degradations and various kinds of waste, it seems clear that much worse results would occur if and when projected 1995 use of NXX digit combinations for area codes were to be started. This sad scenario can be entirely prevented by prompt use of the F-DAC Plan.

As was pointed out above, conversion to F-DACs at this time should be quite practical because of our present combination of modern technology and extensive deployment of digital switching equipment. A great many central offices already are capable of originating international direct distance dialed (IDDD) calls which require thirteen digits or more. Thus, twelve digits should not be too troublesome, even though most central offices may require software changes, but these changes appear not to be a significant problem to switch manufacturers.

Assuming nationwide conversion to the F-DAC Plan, the resulting inconvenience to the public would be that everyone in one NPA would have to dial one extra digit for all calls to other U.S. NPAs. More than offsetting this, however, would be the time saved by not having to dial home NPA codes for intra-NPA toll calls, and by not having to wait four seconds for resolution of digit conflicts or, alternatively, to lose the distinctive meaning of the digit "1" as a long distance prefix.

One significant advantage of the F-DAC Plan is that it would allow a relatively painless transition period between use of the present NPA format (N0X/N1X) and the NPA format suggested here (N0XX/N1XX). Initially, F-DACs should be in only the N0X0/N1X0 formats, which means that a distinctive 0 would be in the D digit position, while still retaining the distinctive 0 or 1 in the B digit position. This would make it unnecessary for existing local telephone numbers to be changed and re-memorized. Everyone would have to remember only the simplest of new rules: Where a U.S. area code had been dialed with three digits, the same area code suffixed with a 0 would be dialed. 206 would become 2060, 509 would become 5090, 212 would become 2120, 800 would become 8000, etc. Washington, D.C. would enjoy 2020.

Restricting initial F-DACs to the N0X0/N1X0 formats would permit a grace period of a few months during which calls could be completed using either the old three-digit area code format or the new four-digit format, since most central office switching machines probably could be programmed simply to ignore a 0 in the D digit position if one appeared there. This would be true even if all NPA

codes were officially changed by adding the fourth digit 0. The grace period would be a great convenience to the public while people learned the new procedures. It would also allow a period of time during which people could reprogram such things as dialers (including those computers equipped with modems) and speed calling repertories.

Prior to the end of the grace period, all urgent pending area code splits could be facilitated by use of the few currently remaining three-digit N0X/N1X codes, possibly including certain N11 codes if absolutely required. That should present no threat because even if the forthcoming F-DAC formats were restricted so that they contained only a 0 or a 1 in the D digit position, we would be get prompt availability of double our present number of area codes (2060 and 2061 in the present 206 NPA, for example). Significantly, this doubling of available area codes would not require new conflict resolutions, together with their concomitant post-dialing delays or other problems. It is important that scheduled further use of N0X/N1X area code formats for local office codes be held to a minimum. This will reduce the necessity to impose large-scale number changes on the public in the future if we wish to rid ourselves of the problems caused by use of N0X/N1X formats for local office codes.

At some time after the grace period, the next step in the F-DAC Plan could be implemented. This would double the present number of available area codes by starting the use of N0X1/N1X1 formats. Even then, the D digit, as well as the B digit, would retain distinction so that the D digit could not be confused with the first digit of an NNX or NXX local office code. All central office switches could be programmed to stop recognizing as valid any U.S. number determined by the second digit to start with an area code, but not containing 0 or 1 in the fourth digit, which by that time would have become a required final digit of the area code.

In much later years, when even double our present number of area codes would be insufficient nationwide, additional area codes could be assigned by breaking into new ground, the codes such as 2062-2069 (N0XX/N1XX), all of which could be used without any need for telephone companies to assign local central office codes with a 0 or a 1 in the B digit.

For the sake of simplicity for many years, all of the four-digit area codes could be reserved for use in the geographic areas formerly served by their three-digit predecessors. Availability of ten area codes where there had been only one should be adequate in even the fastest growing populous areas for decades, and if some areas later begin to exhaust the nine additional area codes created by F-DAC, there would be no harm at that time in using area codes derived from the less used three-digit predecessors that had been associated with other geographic areas.

From a world standpoint, the F-DAC Plan should cause very little inconvenience. The transition period suggested above would offer a span during which dialing from foreign countries to the U.S. in either the old three-digit format or the new four-digit format would cause completion of calls without additional delay. Moreover, as long as new U.S. F-DACs can be confined to those having only a 0 or a 1 as the D digit, and as long as they do not contain first three digit sequences that comprise area codes used in the future in the non-U.S. portions of the NANP, dialers from foreign countries will be able to call NANP countries that chose to keep three-digit area codes without difficulty. This is because each three-digit non-U.S. NANP area code would still retain its individual distinction. For that same reason, dialing three-digit foreign NANP area codes from the U.S. would

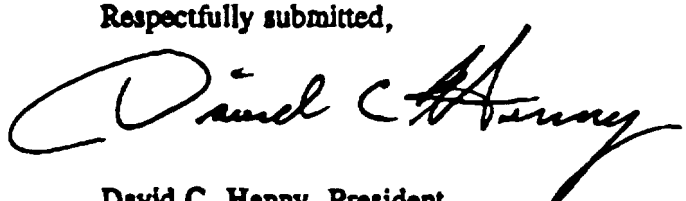
not result in delays associated with digit conflict resolution as long as we had not used any four-digit derivatives from the specific foreign three-digit codes.

It should be noted that within many foreign countries, there are now differing lengths of dialing patterns for both city codes and local telephone numbers. Therefore, regardless of what combinations of non-conflicting three and four-digit area codes were used in the U.S. and in other parts of the NANP, the matter probably would be of little concern to dialers in other parts of the world.

Conclusion

Bellcore, as NANP Administrator, may have worked reasonably well up to this point, but recently may have become too involved with focus on its own interests and those of its owners, rather than the public interest. In times of rapidly changing technology, it has failed timely to re-examine its now 20 year old Interchangeable Code Plan, to take imaginative and prudent preventive steps to avert or to mitigate the numbering crisis now facing this country without subjecting the public to time-consuming inefficiencies and unnecessary time and money costs, not to mention frustrations. Repeating an above statement for emphasis, it is likely that an informed public would much prefer remembering and using the one additional (D) area code digit and retaining existing intra-NPA dialing patterns, as opposed to being forced to dial 10 digits for all long distance calls, as well as suffering confusion and inefficiency due to expansion of interchangeable codes. At this point, emergency measures must be taken to change our direction away from all but the most necessary implementation of use of office codes with a second digit of 0 or 1, and to avoid altogether use of area codes without a 0 or 1 as the second digit. The F-DAC Plan is a far-reaching solution which deserves immediate scrutiny from the FCC because it well may be found to be in the public interest, possible to implement within the necessary period of time, and a plan that will serve us, our children and our children's children far better than a fully implemented Interchangeable Code Plan.

Respectfully submitted,



Date: December 25, 1992

David C. Henny, President
Whidbey Telephone Company
2747 E. State Highway 525
Langley, Washington, 98260-9799
(206) 321-1111